

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
(MEMPHIS DIVISION)

IN RE REGIONS MORGAN KEEGAN )  
SECURITIES, DERIVATIVE AND ERISA )  
LITIGATION )

This document relates to: )

*In re Regions Morgan Keegan ERISA Litig.*, )  
No. 2:08-cv-02192-SHM-dkv )

Case No. 2:09-cv-02009-SHM

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)

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AGREEMENT, SETTLEMENT SUBCLASS CERTIFICATION AND APPROVAL OF  
PLAN OF ALLOCATION**

Named Plaintiffs Gary Shamblin, Terry Hamby, Nancy Jackson, Barbara Williams, Robert Harrison, Caesar L. Smith and James K. Smith, III, and the Representative Customer Plans, including court-appointed trustee *ad Litem* of trust or custodial accounts for the Representative Customer Plans, C. Fred Daniels (who is included among the Named Plaintiffs only and solely in his capacity as the court-appointed trustee *ad Litem* of trust or custodial accounts for each of the Representative Plans), respectfully move the Court for an Order: (a) finally approving the Class Action Settlement Agreement; (b) finally certifying the four subclasses for settlement purposes and appointing Co-Lead Class Counsel; and (c) approving the Plan of Allocation.

This motion is based on Plaintiffs' Memorandum in Support of Co-Lead Class Counsels' Motion for Award of Attorneys' Fees and Expenses and Named Plaintiff Case Contribution Awards; the Declaration of Derek W. Loeser in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement Agreement, for Settlement Subclass Certification, And for Approval

of Plan of Allocation, and Co-Lead Class Counsel's Motion for Award of Attorneys' Fees and Expenses and Named Plaintiff Case Contribution Awards and Exhibit nos. 1 through 16 thereto, the Declaration of Margaret E. Wetherald and Exhibit nos. 1 through 4 thereto, and the Declaration of Jennifer M. Keough Regarding Notice Dissemination and Publication and Exhibit nos. A through E thereto. Plaintiffs also submit the [Proposed] Final Approval Order and Judgment and Appendix A thereto.

Respectfully submitted this 23rd day of September, 2014.

Respectfully Submitted,

/s/Margaret E. Wetherald

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**CERTIFICATE OF SERVICE**

**I hereby certify that I have on September 23, 2014 filed**

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT AGREEMENT, SETTLEMENT SUBCLASS  
CERTIFICATION AND APPROVAL OF PLAN OF ALLOCATION**

**electronically with the Clerk of Court, which will send notification of such filing to  
counsel in this matter.**

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